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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION

TRAVONNE BORDERS, an
individual,

Plaintiff,

v.

INTERNATIONAL PAPER
COMPANY, a New York
corporation; ANGIE DOE, an
individual; and DOES 1 through 20,
inclusive,

Defendants.

Case No. _____
*Previously known as Los Angeles
Superior Court Case No. 22STCV15935*

**DECLARATION OF
CHRISTOPHER M. CHAMPINE IN
SUPPORT OF DEFENDANT'S
NOTICE OF REMOVAL OF CIVIL
ACTION FROM STATE COURT TO
FEDERAL COURT PURSUANT TO
28 U.S.C. §§ 1332, 1441, AND 1446**

State Court Complaint Filed: 5-12-2022

I, Christopher M. Champine, declare as follows:

1. I am an attorney at law, licensed to practice in the State of California and before this Court. I am an associate with Fisher & Phillips LLP, counsel of record for INTERNATIONAL PAPER COMPANY ("Defendant") in this case and make this Declaration in support of Defendant's Notice of Removal under 28 U.S.C. §§ 1332, 1441, and 1446. All of the information set forth herein is based on my personal and first-hand knowledge except where indicated, and if called and sworn as a witness, I could and would testify competently thereto.

2. On information and belief, on or about May 12, 2022, Plaintiff filed a Complaint in Los Angeles Superior Court. A true and correct copy of the Complaint is attached hereto as **Exhibit A**.

CERTIFICATE OF SERVICE

I, the undersigned, am employed in the County of San Diego, State of California. I am over the age of 18 and not a party to the within action; am employed with the law offices of Fisher & Phillips LLP and my business address is 4747 Executive Drive, Suite 1000, San Diego, California 92121.

On the below date, I served the foregoing document entitled **DECLARATION OF CHRISTOPHER M. CHAMPINE IN SUPPORT OF DEFENDANT'S NOTICE OF REMOVAL OF CIVIL ACTION FROM STATE COURT TO FEDERAL COURT PURSUANT TO 28 U.S.C. §§ 1332, 1441, AND 1446** on all the appearing and/or interested parties in this action with ☐ the original ☒ a true copy thereof addressed as follows:

Samvel Setyan (SBN 325831)
SETYAN LAW, APC
750 E. Green Street, Suite 310
Pasadena, California 91101

*Attorney for Plaintiff,
Travonne Borders*

T: 213-618-3655
E: s.setyan@setyanlaw.com

- ☐ **[by ELECTRONIC SUBMISSION]** - I served the above listed document(s) described via the United States District Court's Electronic Filing Program on the designated recipients via electronic transmission through the CM/ECF system on the Court's website. The Court's CM/ECF system will generate a Notice of Electronic Filing (NEF) to the filing party, the assigned judge, and any registered users in the case. The NEF will constitute service of the document(s). Registration as a CM/ECF user constitutes consent to electronic service through the court's transmission facilities.
- ☐ **[by MAIL]** - I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at San Diego, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postage cancellation date or postage meter date is more than one day after date of deposit for mailing this affidavit.
- ☒ **[by FEDERAL EXPRESS]** - I am readily familiar with the firm's practice for collection and processing of correspondence for overnight delivery by Federal Express. Under that practice such correspondence will be deposited at a facility or pick-up box regularly maintained by Federal Express for receipt on the same day in the ordinary course of business with delivery fees paid or provided for in accordance with ordinary business practices.

I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed June 15, 2022 at San Diego, California.

Susan Jackson

Print Name

By:

Signature